## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TARA ALAMEDA, KAMECA BALAN, and DEBBIE HAMELL-PALMER, on their own behalves and on behalf of a class of similarly situated persons,

Plaintiffs,

- against -

ASSOCIATION OF SOCIAL WORK BOARDS,

Defendant.

No. 7:23-cv-06156 (KMK)

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and exhibit(s) annexed thereto, and upon all the prior pleadings and proceedings herein, Defendant, the Association of Social Work Boards will move this Court before the Honorable Kenneth M. Karas at the United States District Courthouse for the Southern District of New York, located at 300 Quarropas Street, White Plains, New York 10601, at a date and time to be determined by the Court, for an Order dismissing the First Amended Complaint ("FAC") with prejudice pursuant to Fed. R. Civ. P. 12(b)(6), on the grounds that the FAC fails to state a claim for relief, and for such other, further or different relief as the Court deems just and proper.

Dated: December 8, 2023 Respectfully submitted,

/s/ Jennifer Ancona Semko

Jennifer Ancona Semko (pro hac vice) James Gilmore (pro hac vice) BAKER McKENZIE LLP 815 Connecticut Ave., NW Washington, DC 20006

Tel: (202) 835-4250 Fax: (202) 416-7055

jennifer.semko@bakermckenzie.com james.gilmore@bakermckenzie.com

Jeffrey A. Sturgeon (pro hac vice) Kelechi Okengwu BAKER McKENZIE LLP 452 Fifth Avenue New York, NY 10018

Tel: (212) 626-4339 Fax: (212) 310-1870

jeffrey.sturgeon@bakermckenzie.com kelechi.okengwu@bakermckenzie.com

Attorneys for Defendant Association of Social Work Boards

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of December 2023, a true and correct copy of the foregoing was served on all counsel of record using the Court's electronic filing system.

/s/ Jennifer Ancona Semko